

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

EQUAL EMPLOYMENT OPPORTUNITY)	
COMMISSION,)	
)	
Plaintiff,)	
)	Case No. WDQ-02-CV-648
v.)	
)	
LA WEIGHT LOSS CENTERS, INC.,)	
)	
Defendant.)	
_____)	

DECLARATION OF CORBETT ANDERSON

I, Corbett Anderson, hereby state as follows:

1. I am an attorney for the U.S. Equal Employment Opportunity Commission (“EEOC”) and have served as a co-counsel in this case since 2003.
2. On December 12, 2005, I spoke with an attorney for YAHOO! HotJobs, Julie Shermak, to discuss the possibility of serving a subpoena on YAHOO! HotJobs for all documents related to LA Weight Loss from 1997 to present, including but not limited to all job postings or advertisements ever made on LA Weight Loss accounts, and all responses to each such posting or advertisement, including but not limited to applications, résumés, cover letters, or other documents of similar character related to services provided to LA Weight Loss.
3. I was informed that YAHOO! HotJobs works on the “slot model” rather than the “posting model” used by other online job boards. It was explained to me that, under the slot model used by YAHOO! Hotjobs, a company purchases one or more slots on HotJobs and, within each slot, the company can change job advisements as the need arises. Ms. Shermak told me that given that the advertisements on each slot are fluid , she was uncertain of whether

YAHOO! Hotjobs could produce job advertisements and responses to those advertisements in such a way as to match each person's application with the job advertisement to which each person responded.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: June 1, 2007


Corbett Anderson